

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

*In the Matter of:*

Gwynedd Post Office (Branch)  
Gwynedd, PA 19436  
Christina Surowiec, Petitioner

Docket Number A2011-15

**SUPPLEMENTAL COMMENT IN RESPONSE TO ADMINISTRATIVE RECORD**

(July 18, 2011)

On or about July 1, the United States Postal Service filed a partially redacted administrative record concerning the Gwynedd (PA 19436) Post Office, also referred to by USPS as a “classified station” but apparently more closely meeting the definition of a Post Office Branch operated as a subsidiary unit of the North Wales (PA 19454) Post Office. Petitioner is appealing the USPS decision to close its Gwynedd location.

The remarks in this Supplemental Comment by Petitioner pertain primarily to the access situation.

On page 9 of USPS’ Administrative Record, a communication from Foulkeways to the North Wales postmaster indicates that, following the Penndot (Pennsylvania Department of Transportation) project to widen and reconfigure US Route 202, “. . . there would be no road access to the Post Office” (emphasis in the original). As Petitioner and other parties supporting the appeal of the closure have conveyed to the Commission, this is not a correct characterization.

However, recent construction activities have complicated the situation, as Petitioner intends to detail in this document.

The entities most directly relevant to the present controversy over the announced closure of the Gwynedd Post Office are:

- (1) Foulkeways retirement community, the landowner and lessor of the Gwynedd Post Office building from its construction in 1967
- (2) USPS
- (3) Penndot (Pennsylvania Department of Transportation), in charge of the US Route 202 roadwork
- (4) Lower Gwynedd Township, in charge of planning, zoning, and building permit issuance

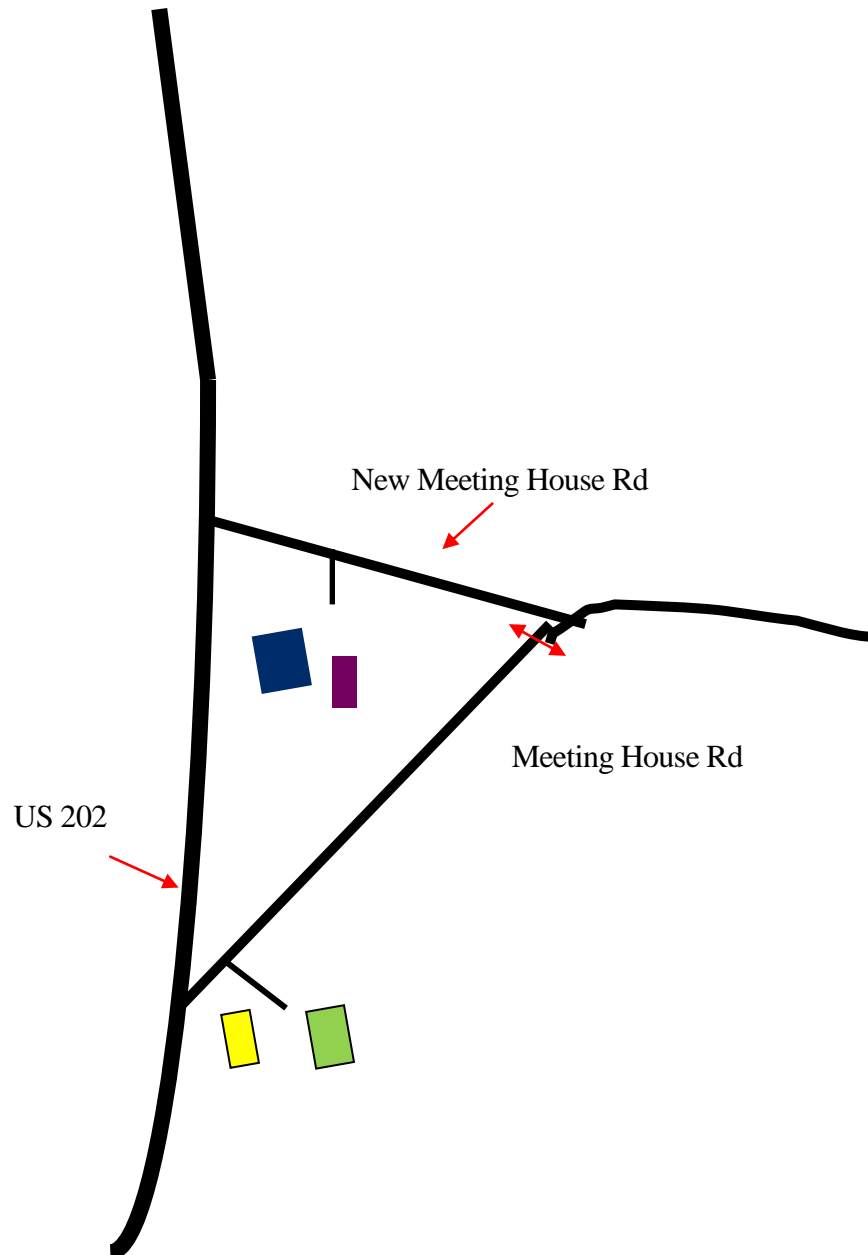
Petitioner contacted the office of her state representative, Kate Harper, in late May hoping to get a timeline on the Route 202 roadwork currently (then and now) in progress. She spoke with one of the Representative's staff members. Ms. Harper has been an influential point person with Penndot, as her intercession led to some changes in the construction schedule and also some modifications in the plan (e.g., treed buffer areas in the Hancock Road and Swedesford Road areas for visual screening and noise abatement). When the Petitioner contacted Rep. Harper's office, there was still some quickly fading hope that the closure of the Gwynedd Post Office could be at least delayed through an Application for Suspension Pending Review. Petitioner sought reassurance that access to the Post Office on "old" Meeting House Road (the original intersection) would be retained throughout the appeal. Rep. Harper's staff member indicated that the original Meeting House Road intersection would remain open for at least several more months.

Nevertheless, on Thursday, July 14 the roadwork crew, presumably authorized by Penndot, closed the original Meeting House Road intersection with US 202 – by means of a "Road Closed" sign, not an actual physical barrier – and opened the new Meeting House Road access. The new Meeting House Road deviates from the original Meeting House Road near its

original terminus and connects with Route 202 at a point slightly north of the original intersection. Furthermore, the roadway at the point where “new” Meeting House Road deviates from “old” Meeting House Road was elevated by several feet. As a result, drivers on Meeting House Road are now barred from following the original roadway, although someone could probably still navigate a Humvee down the newly constructed bank from the higher surface of the new road onto the original road. What had been a simple “Y” intersection now has a barrier. Please consult the map on the next page – not drawn to scale, but showing relevant features with reasonable accuracy – for visual assistance in following this narrative. The newly inserted barrier is represented by a red double arrow where the original and reconfigured roadways for Meeting House Road diverge.

The late May communication from the State Representative’s office was that the new Meeting House Road intersection would only open when (a) the widening of 202 to four lanes along this segment was complete, and (b) underground utilities and overhead wires were relocated. Neither has occurred; the two new lanes of Route 202 are now in place, in a roughed-out condition, but they have not gotten their final resurfacing.

The map shows four structures in the area. The blue square designates the Beaumont House; the purple rectangle, the so-called Carriage House; the yellow rectangle, the building that served as Gwynedd Post Office from 1967 until May 27, 2011; and the nearby light green rectangle, the Lower Gwynedd substation of the North Penn Fire Company. Another new development from the roadwork crew is the construction of a short entryway – it stops after about 20 feet – from the new Meeting House Road into the portion of Foulkeways property with the Beaumont House and Carriage House. The other driveway shown on the map is the access to the Post Office building as well as the firehouse, which share a parking lot. The remains of the



former Meeting House Road terminus still join Route 202 and in fact provide the only access for the fire station.

Probably needless to say, access to the fire company substation cannot be eliminated unless or until the fire company opens a fully ready replacement facility somewhere in the area. Thus, although use of the Post Office is judged impossible because the road is permanently cut off, including insertion of a barrier on the non-202 end of the part of Meeting House Road in question, the firehouse remains dependent on this intersection with Route 202, which is now its only point of egress. Petitioner wishes to review the zoning status of the structures in this area, to the extent that this information is publicly available.

First, as an aside, Petitioner will observe that at the March 3 public meeting, mentioned frequently in the submissions to the Commission pertaining to this case, no one from Penndot, Lower Gwynedd Township, or Foulkeways spoke in an official capacity. Two or three Lower Gwynedd Township officials (at least one person on the Board of Supervisors, along with a planning commission member) did speak, against the closure, but they did so only as private citizens and community residents. A number of Foulkeways residents (not Foulkeways administrators) also attended the March 3 meeting; all Foulkeways residents who spoke expressed emphatic opposition to Gwynedd Post Office being closed.

This is the current status of the four Foulkeways-owned structures depicted on the map, all in the vicinity of the US Route 202-Meeting House Road intersection:

1. Beaumont House: This historic structure, dating from 1817, was moved out of the way of the 202 road project in 2006. In February 2007, Lower Gwynedd Township supervisors voted to rezone the parcel where it stands for use as a post office. In a statement at the November 2007 township supervisors meeting, the CEO of Foulkeways, Douglas Tweddale, indicated that the

Beaumont House remodeling would be for joint purposes of a post office on the ground floor and short-term guest lodging for people visiting Foulkeways residents upstairs. By this time, the existing post office was no longer in the path of the 202 road project, although anticipated destruction of the existing Gwynedd Post Office to accommodate the new roadway provided the original motivation for relocating the post office into the Beaumont House. At the November 2007 township board meeting, Mr. Tweddale announced that Foulkeways wished to convert the existing post office into residential units, and to coordinate with the township on the construction of a new firehouse. The supervisors took no action on either of these matters. Widespread local and regional publicity surrounding the physical move of the historic Beaumont House included mention of its novel dual use as both post office and Foulkeways guest quarters. According to the township's chief planning and zoning official, the permit issuance process for this conversion and use of the Beaumont House came closer to finalization than any other of the numerous plans or proposals bandied about for various sites on Foulkeways property in the post office/Beaumont House vicinity. As late as the March 3, 2011 public meeting held by USPS to discuss closing the Gwynedd Post Office, numerous community residents in attendance were under the impression that the Beaumont House would be the site of a (slightly) relocated Gwynedd Post Office. However, in August 2009, Foulkeways submitted to township supervisors an amended plan for the Beaumont House in which its designated use was specified as Foulkeways office space and Foulkeways guest quarters, with no provision for a post office.

2. The "Carriage House": This is an old gabled house, adjacent to the relocated Beaumont House in its post-move location. At the above-mentioned August 2009 Lower Gwynedd Township Board of Supervisors meeting, the supervisors voted for conditional approval of conversion of the carriage house into a post office. If the carriage house were not made into a post office, it would be

demolished. The online minutes for this township meeting record a mention by Mr. Tweddale of “rumors” that Gwynedd Post Office would close, a retrospectively striking reference.

3. Gwynedd Post Office: At the same August 2009 meeting, the township supervisors heard Foulkeways’ request to convert this structure into residential units.

4. North Penn Fire Company Substation: A substation of the local volunteer fire company is located in a structure that shares space with the Foulkeways maintenance shop, and uses the same parking lot and driveway as Gwynedd Post Office. Since 2007, discussions about a new, larger, stand-alone fire station to replace it, presumably somewhere in the almost immediate vicinity, have taken place. These have *not* advanced to the stage of any firm proposal, definite plan, or financing arrangement. Thus, the existing fire station can be expected to stay in use for the foreseeable future.

Lower Gwynedd Township’s chief planning and zoning officer informs Petitioner that all of Foulkeways’ plans for this large corner of its property with the Gwynedd Post Office, Beaumont House, carriage house and fire substation are contingent on multiple unfulfilled conditions. They are therefore *absolutely not considered approved* at the present time, in whole or in part. Petitioner and the affected residents she has been in contact with have no overwhelming preference for one Gwynedd Post Office site over another; the overriding concern is simply that there continue to *be* a Gwynedd Post Office. The existing post office building and other structures in the vicinity all benefit from proximity to Route 202 that the USPS ought to consider a business asset.

As the recently released Administrative Record shows, USPS’ lease of the post office building that served the Gwynedd community for several decades ran through the end of October 2013. If Foulkeways had waited until that date and then not renewed the lease in order to regain control of its property, that would be an open exercise of its interests and the community (including, in all likelihood, a large preponderance of Foulkeways’ own residents) would be disappointed but with no

effective recourse. This is not what happened. The closure process is supposed to pay regard to the interests of the public, USPS and USPS employees. By this standard, the closure of Gwynedd Post Office has certainly not been justified. Impaired access due to the road project has always seemed more of an excuse than a reason. The move a few days ago to block off old Meeting House Road does not change that. Moreover, that blockage is reversible, either by removing the barrier or by extending the newly created access way that the Penndot crew put in place along the reconfigured stretch of Meeting House Road.

This closes this supplemental submission by Petitioner, provided for consideration by the Commission and available for perusal by anyone interested in this appeal, docketed with the United States Postal Regulatory Commission as case A2011-15.

Dated this 18th day of July 2011.

Respectfully submitted,

CHRISTINA SUROWIEC, PETITIONER